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9 Attorneys for Defendants
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10 SAMSUNG SDI CO., LTD.,
SAMSUNG SDI (MALAYSIA) SDN. BHD.,
11 SAMSUNG SDI MEXICO S.A. DE C.V.,
SAMSUNG SDI BRASIL LTDA.,
12 SHENZEN SAMSUNG SDI CO., LTD. and
TIANJIN SAMSUNG SDI CO., LTD.

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 In re: CATHODE RAY TUBE (CRT)
18 ANTITRUST LITIGATION

Master File No. 3:07-cv-5944-SC

MDL No. 1917

19 This Document Relates to:

20 ALL ACTIONS
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**DECLARATION OF TYLER M.
CUNNINGHAM IN SUPPORT OF
SAMSUNG SDI DEFENDANTS'
OPPOSITION TO PLAINTIFFS'
ADMINISTRATIVE MOTION FOR
ORDER PERMITTING THE
DEPOSITION OF LEO MINK TO BE
COMPLETED BY JANUARY 30, 2015**

1 I, Tyler M. Cunningham, do hereby declare as follows:

2 1. I am a member of the bar of the State of California and an associate with
3 Sheppard, Mullin, Richter & Hampton LLP, counsel of record for defendants Samsung
4 SDI America, Inc., Samsung SDI Co., Ltd., Samsung SDI (Malaysia) Sdn. Bhd., Samsung
5 SDI Mexico S.A. De C.V., Samsung SDI Brasil Ltda., Shenzhen Samsung SDI Co., Ltd.,
6 and Tianjin Samsung SDI Co., Ltd. (collectively "SDI") in these actions. I make this
7 declaration in support of SDI's Opposition to Plaintiffs' Administrative Motion for Order
8 Permitting the Deposition of Leo Mink To Be Completed by January 30, 2015. Except for
9 those matters stated on information and belief, about which I am informed and which I
10 believe to be true, I have personal knowledge of the matters set forth herein, and could and
11 would testify competently to each of them.

12 2. In October 2011, SDI served supplemental responses to the Direct Purchaser
13 Plaintiffs' First Set of Interrogatories, which identify more than 30 instances in which Mr.
14 Leo Mink met or communicated with other CRT manufacturers.

15 3. Attached hereto as Exhibit A is a true and correct copy of a letter dated
16 December 3, 2012 from Mario N. Alioto to John Taladay.

17 4. Attached hereto as Exhibit B is a true and correct copy of a letter dated
18 December 18, 2012 from Charles Malaise to Mario N. Alioto.

19 5. I am informed and believe that Plaintiffs have deposed eight individuals
20 associated with the Philips defendants, and that Plaintiffs have deposed one Philips
21 corporate representative pursuant to Fed. R. Civ. P. 30(b)(6), and have noticed the
22 deposition of an additional Philips representative.

23 I declare under penalty of perjury under the laws of the United States that the
24 foregoing is true and correct.

25 Executed on September 5, 2014 at San Francisco, California.

26 /s/ Tyler M. Cunningham
27 TYLER M. CUNNINGHAM
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